

**LEVI HUEBNER & ASSOCIATES, PC**  
**ATTORNEYS AND COUNSELORS AT LAW**

---

488 EMPIRE BOULEVARD, SUITE 100  
BROOKLYN, NY 11225  
TEL: (212) 354-5555  
FAX: (718) 636-4444

[EMAIL: NEWYORKLAWYER@MSN.COM](mailto:NEWYORKLAWYER@MSN.COM)

July 21, 2021

Honorable Judge Allyne R. Ross  
225 Cadman Plaza East  
Brooklyn, NY 11201

***Re: Express Freight Systems, Inc. v. YMB., Case No. 20-cv-00186 (ARR)(LB)***

Honorable Judge Ross:

This firm represents Defendant, YMB Enterprise Inc. On June 30, 2021, by electronic Order, Your Honor directed that Plaintiff's motions shall be briefed "according to the same schedule . . . opposition papers shall be served no later than July 9<sup>th</sup>, 2021 and plaintiff's reply papers, shall be served no later than July 16<sup>th</sup>, 2021."

Thereafter, Your Honor granted Defendant's first request for an extension of time and by electronic Order dated July 8, 2021 and directed that "defendant's opposition papers are now due July 23, 2021 and the plaintiff's reply papers . . . are due July 30, 2021."

Unfortunately, my firm has been further set back, as my paralegal has been dealing with his father who has undergone emergency surgery requiring amputation.

Due to the foregoing, we have been unable to complete the opposition to Plaintiff's respective motions.

As such, Defendant respectfully requests that the time to serve opposition to Plaintiff's respective motions be extended one-week from July 23, 2021 to July 30, 2021, and likewise, that Plaintiff's time to serve its reply papers, be extended from July 30, 2021 to August 6, 2021.

Defendant will be severely prejudiced if it is not granted an extension, while, Plaintiff will suffer no prejudice by a one-week extension, particularly since Plaintiff is only requesting partial summary judgment and expects to conduct post motion proceedings.

This day, requesting a one-week extension, I contacted counsel for Plaintiff, who did not consent, stating "as I said before, my client will not authorize me to delay this matter any further."

Respectfully submitted,

/ s / Levi Huebner

---

*Attorneys for YMB Enterprise Inc.*